

IH-32

Rev: 2014-1

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

H. Rogers Varner, Jr., on behalf of himself
and all others similarly situated,

| | |
|---|------------------------------|
| Plaintiff VS. <small>Bank of Nova Scotia, New York Agency; BMO Capital Markets Corp.; BNP Paribas Securities Corp.; Barclays Capital Inc.; Cantor Fitzgerald & Co.; Citigroup Global Markets Inc.; Commerz Markets LLC; Countrywide Securities Corp.; Credit Suisse Securities (USA) LLC; Daiwa Capital Markets America Inc.; Deutsche Bank Securities Inc.; Goldman, Sachs & Co.; HSBC Securities (USA) Inc.; Jefferies LLC; J.P. Morgan Securities LLC; Merrill Lynch, Pierce, Fenner & Smith Incorporated; Mizuho Securities USA Inc.; Morgan Stanley & Co. LLC; Nomura Securities International, Inc.; RBC Capital Markets, LLC; RBS Securities Inc.; SG Americas Securities, LLC; TD Securities (USA) LLC; and UBS Securities LLC,</small> | Case Number <hr/> |
| Defendant | |

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

State-Boston Retirement System, on
behalf of itself and all others similarly
situated,

| | |
|--|--|
| Plaintiff vs. Bank of Nova Scotia, New York Agency, et al., | Case Number 1:15-cv-5794-PGG <hr/> |
| Defendant | |

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Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

☒

Open

(If so, set forth procedural status and summarize any court rulings.)

See Attachment A.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

The newly filed case and the fourteen earlier filed cases are all based on the same general course of conduct by predominantly overlapping defendants, concerning manipulation of the markets for U.S. Treasury Securities by primary dealers of U.S. Treasury Securities. These cases assert common claims against an overlapping set of defendants.

Signature: _____



Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.

Date: 09/16/2015

Firm: _____

Attachment A to the Related Case Statement

The initial complaint was filed on July 23, 2015. Thirteen other related cases were subsequently filed between July 23, 2015 and September 1, 2015:

- Beaver County Employees' Retirement Fund, et al. v. Bank of Nova Scotia, New York Agency, et al., 1:15-cv-05807-PGG;
- Arkansas Teacher Retirement System v. Bank of Nova Scotia, New York Agency, et al., 1:15-cv-05830-PGG;
- Federighi v. Bank of Nova Scotia, New York Agency, et al., 1:15-cv-05843-PGG;
- United Food and Commercial Workers Union and Participating Food Industry Employers Tri-State Pension Fund v. Bank of Nova Scotia, New York Agency, et al., 1:15-cv-05931-PGG;
- Inter-Local Pension Fund Graphic Communications Conference of the International Brotherhood of Teamsters v. Bank of Nova Scotia, New York Agency, et al., 1:15-cv-05939-PGG;
- United International Insurance Co. v. Bank of Nova Scotia, New York Agency, et al., 1:15-cv-05957-PGG;
- IBEW Local 640 Arizona Chapter NECA Pension Trust Fund v. Bank of Nova Scotia, New York Agency, et al., 1:15-cv-06003-PGG;
- City of Pontiac Police and Fire Retirement System v. Bank of Nova Scotia, New York Agency, et al., 1:15-cv-06072-PGG;
- Rutgers Enhanced Insurance Co. v. Bank of Nova Scotia, New York Agency, et al., 1:15-cv-06129-PGG;
- St. John v. Bank of Nova Scotia, New York Agency, et al., 1:15-cv-06139-PGG;
- Oklahoma Firefighters Pension and Retirement System v. Bank of Nova Scotia, New York Agency, et al., 1:15-cv-06474-PGG;
- Cleveland Bakers and Teamsters Pension Fund et al. v. Bank of Nova Scotia, New York Agency, et al., 1:15-cv-06782-PGG;
- and Fouts v. Bank of Nova Scotia, New York Agency, et al., 1:15-cv-06892-PGG.

All of the foregoing cases are putative class actions. To date, no court rulings have been issued.